

# Rickner PLLC

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May 18, 2023

## Via ECF

The Honorable Cheryl L. Pollak, U.S.M.J.  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *LaFrantz v. Diocese of Brooklyn, et al.*, 21-cv-04920-DLI-CLP

Dear Judge Pollack,

We represent Plaintiff Jeanne LaFrantz in the above-captioned matter and we write, pursuant to the Court's April 20, 2023 Order directing the parties to provide a status update regarding the discovery disputes we discussed during the last court conference. Counsel for the Diocese of Brooklyn has reviewed and approved this letter; counsel for St. Mary's Roman Catholic Church is out of the office and did not have an opportunity to approve it.

With respect to the Defendants' objections regarding the three witnesses Plaintiff served deposition notices for, the parties made some progress. The parties agreed to at least temporarily table this issue and instead look to other potential witnesses. Defendants have agreed to provide the names of any living Diocesan priests who overlapped in assignments with Father Campbell at St. Mary's during the relevant time at issue, within the next 30 days.

With respect to the Defendants' First Amendment objections to the disclosure of certain information, the parties have reached a potential agreement. There are only a handful of redacted pages at issue, so the parties would like, with the Court's permission, to provide these pages for *in camera* review. Provided the Court agrees to this, the Defendants request permission to file a 3-page letter brief explaining the privileged asserted within 21 days. Plaintiff will then file a 3-page response brief within 7 days.

We thank the Court for its attention to this matter.

Respectfully,

/s/

Rob Rickner